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The Procter & Gamble Company
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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 THE PROCTER & GAMBLE COMPANY,)

14 Plaintiff,)

15 v.)

16 KRAFT FOODS GLOBAL, INC.,)

17 Defendant.)

Case No.: 3:08-cv-00930 PJH

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE FOR
PARTIES TO MEET AND CONFER
REGARDING PROPOSED LIMITED
DISCOVERY SCHEDULE PURSUANT
TO THE COURT'S AUGUST 15, 2008
ORDER**

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3 WHEREAS, the Court's August 15, 2008 Order Granting Motion to Stay instructed the parties
4 "to meet and confer with respect to proposed limited discovery, and to present a stipulated proposal to
5 the Court, no later than September 15, 2008," and further ordered that "[i]f the parties are unable to
6 agree on a stipulated proposal, they are instructed to contact the courtroom deputy for the undersigned,
7 in order to request that a further case management conference be scheduled"; and

8 WHEREAS, the parties are pursuing serious settlement discussions which, if successful, would
9 resolve this action; and

10 WHEREAS, the parties believe that a thirty day extension of the September 15, 2008 deadline
11 would facilitate their settlement discussions;

12 NOW, THEREFORE, the parties jointly request the Court to enter the accompanying Proposed
13 Order extending through October 15, 2008 the deadline for the parties to meet and confer with respect
14 to the proposed limited discovery and to either present a stipulated proposal to the Court or advise the
15 Court's courtroom deputy of the need for a case management conference.

16 Dated: September 9, 2008

HOWREY LLP

17
18 By: /s/ Martha K. Gooding
19 MARTHA K. GOODING
20 Attorneys for Plaintiff
The Procter & Gamble Company

21 Dated: September 9, 2008

QUINN EMANUEL URQUHART OLIVER &
HEDGES LLP

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23 By: /s/ Evette D. Pennypacker
24 EVETTE D. PENNYPACKER
25 Attorneys for Defendants
26 Kraft Foods Global, Inc.
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15 v.)

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17 Defendant.)

Case No.: 3:08-cv-00930 PJH

**[PROPOSED] ORDER EXTENDING
DEADLINE FOR PARTIES TO MEET
AND CONFER REGARDING PROPOSED
LIMITED DISCOVERY SCHEDULE
PURSUANT TO THE COURT'S AUGUST
15, 2008 ORDER**

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3 The Court has considered the parties' Stipulation for an order extending the deadline for them
4 to meet and confer regarding a proposed limited discovery schedule pursuant to the Court's August 15,
5 2008 Order, and good cause appearing, the Court grants the parties' requested extension. Accordingly,
6 the Court orders that the parties shall have through October 15, 2008 to meet and confer with respect to
7 proposed limited discovery as required by the Court's August 15, 2008 Order, and to either present the
8 Court with a stipulated proposal or contact the Court's courtroom deputy to request that a further case
9 management conference be scheduled.
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12 Dated: September __, 2008

13 Hon. Phyllis J. Hamilton
14 Judge, United States District Court
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